

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

**GARY PAGELS, On Behalf of Himself
and All Others Similarly Situated,**
14322 Stratford Road
Riverview, MI 48193,

Plaintiff,

vs.

**JESSE WILLMS, Individually and as
Owner and Operator of Terra
Marketing Group**
#300, 85 Cranford Way
Sherwood Park, AB
T8H 0H9

et al.,

Defendants.

Case No. 2:12-cv-11936-GER-DRG

**STIPULATION TO EXTEND DEADLINE FOR DEFENDANT
TERRA MARKETING GROUP TO FILE RESPONSE TO COMPLAINT**

Plaintiff Gary Pagels ("Plaintiff") and Defendant Terra Marketing Group ("Defendant"), by and through their attorneys of record, STIPULATE AS FOLLOWS:

WHEREAS, Defendant was served with the Complaint on June 11, 2012;

WHEREAS, Defendant requests additional time to respond to the Complaint;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN THE PARTIES THAT the time for Defendant to respond to Plaintiff's Complaint shall be extended to July 16, 2012 to allow Defendant sufficient time to prepare a response.

IT IS SO STIPULATED.

Respectfully submitted,
DATED: July 10, 2012

PIGOTT, LTD.

s/Thomas D. Pigott
By: _____
Thomas D. Pigott (0062919)

2620 N. Centennial Road, Unit H
Toledo, Ohio 43617
Phone: (419) 776-4567
Facsimile: (419) 776-4568
Email: tpigott@pigottlaw.com

Attorneys for Plaintiff Gary Pagels

DATED: July 10, 2012

COTE LEGAL SERVICES, PLLC

By: s/ Matthew D. Coté

Matthew D. Coté
Bar No. P74430

COTE LEGAL SERVICES, PLLC
884 Beaconsfield Ave
Grosse Pointe Park, MI 48230
Email: matt@cote-law.com

Attorneys for Defendant Terra Marketing
Group

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2012, I electronically filed the foregoing document with the clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Attorneys for Plaintiff:

Thomas D. Pigott (0062919)
Pigott, Ltd.
2620 N. Centennial Road, Unit H
Toledo, Ohio 43617
Phone: (419) 776-4567
Facsimile: (419) 776-4568
Email: tpigott@pigottlaw.com

Randall C. Dixon (P32820)
DIXON & HAYES, LTD.
3361 Executive Parkway, Suite 100
Toledo, Ohio 43606
Phone: (419) 536-8600
Facsimile: (419) 534-5934
Email: RandyDixon@DixonHayes.com

Dated the 10th day of July, 2012.

By: s/ Matthew D. Coté

Matthew D. Coté
Bar No. P74430

COTE LEGAL SERVICES, PLLC
884 Beaconsfield Ave
Grosse Pointe Park MI 48230
Email: matt@cote-law.com

Karl S. Kronenberger
(Admission Pending)
KRONENBERGER ROSENFELD LLP
150 Post Street, Suite 520
San Francisco, CA 94108
Telephone: (415) 955-1155
Facsimile: (415) 955-1158
Email: Karl@KRInternetLaw.com

Attorneys for Defendant Terra Marketing
Group